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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL RESPONSES TO
DOCUMENT REQUESTS AND
INTERROGATORIES, ENFORCE THE
COURT ORDER'S ON SEACH TERMS,
AND COMPEL 30(b)(6) TESTIMONY**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Exhibits to Their Motion to Compel
8 Responses to Document Requests and Interrogatories, Enforce the Court Order’s on Search Terms,
9 and Compel 30(b)(6) Testimony (the “Administrative Motion”). The Administrative Motion seeks an
10 order sealing the highlighted portions of Uber’s Letter Brief to Compel Responses to Document
11 Requests and Interrogatories, Enforce Court Order on Search Terms, and Compel Production of
12 30(b)(6) Witness (“Uber’s Motion”) and of Exhibit 8 to the Pritt Declaration ISO Letter Brief to
13 Compel Production of Documents (“Exhibit 8”), as well as the entirety of Exhibits 1-7 and 10 to the
14 Pritt Declaration (“Exhibits 1-7 and 10”).

15 3. The portions of Uber’s Motion marked in red boxes and the green highlighted portions
16 of Exhibits 1-8 and 10 contain or refer to trade secret information, confidential business information,
17 and/or other confidential information, which Waymo seeks to seal.

18 4. Uber’s Motion (portions marked in red boxes in version filed herewith) and Exhibits 1,
19 3-4, 6-7, and 10 (green highlighted portions in version filed herewith) contain, reference, and/or
20 describe Waymo’s highly confidential and sensitive business information. The information Waymo
21 seeks to seal regards the Waymo’s confidential business strategy, including its strategy in connection
22 with acquisitions and future business plans, as well as confidential details regarding Waymo’s bonus
23 program. I understand that this confidential business information is maintained by Waymo as secret.
24 The public disclosure of this information would give Waymo’s competitors access to in-depth insight
25 into—and analysis of—Waymo’s business strategy for its autonomous vehicle system. If such
26 information were made public, I understand that Waymo’s competitive standing would be
27 significantly harmed. Uber’s Motion (portions marked in red boxes in version filed herewith) and
28 Exhibits 6 and 10 (green highlighted portions in version filed herewith) additionally contain,

1 reference, and/or describe confidential details regarding the results of Waymo's efforts in searching
2 for documents in this litigation, including custodian-related information. I understand that this
3 confidential business information is maintained by Waymo as secret. The public disclosure of this
4 information would give Waymo's competitors access to sensitive information that could be used to
5 Waymo's disadvantage. If such information were made public, I understand that Waymo's
6 competitive standing would be significantly harmed. Exhibit 6 (green highlighted portions in version
7 filed herewith) further contains, references, and/or describes Waymo's asserted trade secrets. The
8 information Waymo seeks to seal includes the confidential design and functionality of Waymo's
9 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as
10 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that
11 the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this
12 information would give Waymo's competitors access to descriptions of the functionality or features of
13 Waymo's autonomous vehicle system. If such information were made public, I understand that
14 Waymo's competitive standing would be significantly harmed.

15 5. Exhibit 2 (green highlighted portions in red boxes in version filed herewith) contains,
16 references, and/or describes Waymo's asserted trade secrets. The information Waymo seeks to seal
17 includes the confidential design and functionality of Waymo's proprietary autonomous vehicle
18 system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade
19 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
20 Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's
21 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle
22 system. If such information were made public, I understand that Waymo's competitive standing
23 would be significantly harmed.

24 6. Exhibit 5 (green highlighted portion in version filed herewith) contains a home address
25 for a Waymo employee involved in this litigation. Due to the high public profile of this litigation,
26 public disclosure of this information would cause harm to Waymo and that employee by making his
27 home address public.

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8. Waymo's request to seal is narrowly tailored to those portions of Uber's Motion and of Exhibits 1-8 and 10 that merit sealing.

By /s/ Felipe Corredor
Felipe Corredor
Attorneys for WAYMO LLC

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

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